

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS; *et al.*,

*Plaintiffs,*

v.

REPRESENTATIVE DESTIN HALL, in his  
official capacity as Chair of the House Standing  
Committee on Redistricting; *et al.*,

*Defendants.*

Civil Action No. 23-CV-1057

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NORTH CAROLINA STATE CONFERENCE  
OF THE NAACP; *et al.*,

*Plaintiffs,*

v.

PHILIP BERGER, in his official capacity as the  
President Pro Tempore of the North Carolina  
Senate; *et al.*,

*Defendants.*

Civil Action No. 23-CV-1104

**LEGISLATIVE DEFENDANTS' MOTION TO DISMISS**

Legislative Defendants, by and through undersigned counsel, file this motion to dismiss Counts 10 through 12 of the NAACP Supplemental Complaint, [D.E. 180 ¶¶ 78–121], and Counts III and IV of the Williams Supplemental Complaint, [D.E. 181 ¶¶ 159–76] pursuant to Federal Rule of Civil Procedure 12(b)(1) and, in the alternative, Rule 12(b)(6).

In support of this motion, Legislative Defendants contemporaneously file a supporting memorandum of law and incorporate by reference the facts and arguments stated therein. Additionally, in support of this motion, Legislative Defendants submit and incorporate by reference the following exhibits:

- Exhibit A: *League of United Latin Am. Citizens v. Abbott*, No. 21-CV-00259, Dkt. 1226, Mem. Op. & Order (W.D. Tex. Sept. 30, 2025)

WHEREFORE, Legislative Defendants respectfully request that the Court grant this motion to dismiss and dismiss Counts 10 through 12 of the NAACP Supplemental Complaint and Counts III and IV of the Williams Supplemental Complaint.

Respectfully submitted, this the 4th day of November, 2025.

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*\*Appeared via Special Notice*

**CERTIFICATE OF SERVICE**

I, Phillip J. Strach, hereby certify that I have this day electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will provide electronic notification to counsel of record.

This the 4th day of November, 2025.

**NELSON MULLINS RILEY &  
SCARBOROUGH LLP**

/s/ Phillip J. Strach  
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